



October 13, 2006

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento CA 95833

Reference: NEC Section 800.2 Definition

Honorable Commissioners:

The San Francisco Department of Building Inspection (SFDBI) and the San Francisco Fire Department (SFFD) hereby petition the California Building Standards Commission (CBSC) to amend the definition of "Communications Equipment" in the 2005 Edition of NEC, Section 800.2, by striking out the following text: **and including power equipment (e.g. dc converters, inverters and batteries).**

PROPOSED CHANGE TO 2005 NFPA 70: NATIONAL ELECTRICAL CODE:

ARTICLE 800 Communication Circuits

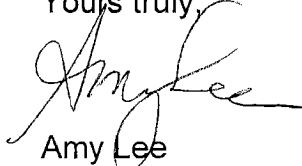
1. General

Communications Equipment. The electronic equipment that performs the telecommunications operations for the transmission of audio, video, and data, ~~and including power equipment (e.g., dc converters, inverters and batteries)~~ and technical support equipment (e.g. computers).

SFDBI and SFFD consider electrical power equipment and related wiring systems in central office facilities to be subject to the provisions of the adopted codes. The CEC definition of Communications Equipment should not exempt communications utilities operating in California from compliance with the minimum standards for electrical safety established by the NEC. The NEC definition, if adopted as written, would allow communications companies to claim that central office power equipment and related wiring systems are exempt from electrical code jurisdiction, as provided in NEC Section 90.2 (B)(4) and CEC Section 89.4(D). First responders and service personnel should know that electrical power equipment in such facilities is installed in accordance with the adopted codes and safe operating procedures are being followed.

Your thoughtful consideration will be appreciated.

Yours truly,

A handwritten signature in black ink, appearing to read "Amy Lee". The signature is fluid and cursive, with the first name "Amy" and last name "Lee" clearly distinguishable.

Amy Lee
Acting Director

cc: Thomas E. Harvey, Captain Bureau of Fire Prevention, SFFD
Barbara Schultheis, Fire Marshall, Bureau of Fire Prevention, SFFD
John O'Rourke, Business Manger, Local Union No. 6 IBEW
Tom Coleman, Executive Secretary, SF Electrical Contractors Association
Carla Johnson, Acting Deputy Director, DBI
Laurence Kornfield, Manager, Technical Services Division
Alan Tokugawa, Code Analyst, Technical Services Division
David Green, Senior Electrical Inspector
Michael Hennessy, Chief Electrical Inspector